

Attachment D

May 9, 2013 EnergySolutions' email

## FW: GRAMA Request 120512

Inbox x



**Sean McCandless** <smccandless@energysolutions.com>

May 9

to me, Phillip, Dean, Vern

Charlie, Dean, and Phil,

Please see pages 10 and 11 of the attached for BAT inspection requirements that DRC has imposed on the White Mesa mill. According to this document, cells and ponds are inspected daily; but decontamination pads are inspected for surface integrity and leak detection weekly.

This precedent supports my concern yesterday that daily free drainage inspections at facilities such as the rotary, IUF, box wash, etc., would be inconsistent. Furthermore, a daily inspection is not necessary to ensure that free draining conditions exist, since free drainage is already a BAT performance standard for these facilities. For example, Part I.E.22.b requires that the intermodal container wash building be operated to ensure that free draining conditions exist.

Accordingly, we would like to remove the daily inspections you've proposed to insert for the rollover, IUF, box wash, track 4 rail wash, rail digging facility, decon access control building, intermodal wash building, shredder, rotary dump thaw, rotary dump, and rotary dump wash. Let me know if you'd like to meet and discuss further, or if we can move forward with this change.

Thanks,  
Sean

**From:** Russell Topham [mailto:[rtopham@utah.gov](mailto:rtopham@utah.gov)]

**Sent:** Thursday, December 06, 2012 1:49 PM

**To:** Treesa Parker; Sean McCandless

**Cc:** Phillip Goble; Shaun Buttars

**Subject:** GRAMA Request 120512

I am forwarding the attached documents in fulfillment of your GRAMA request 120512. If the attached files do not arrive intact, please contact me.

Russell J. Topham, P.E.  
[801.536.4256](tel:801.536.4256).

**DMT Plan July 2012 Rev**



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